

EXHIBIT A

IN THE CIRCUIT COURT OF PLATTE COUNTY, MISSOURI

ATHENA REYNOLDS,
 c/o Cornerstone Law Firm
 8350 N. St. Clair Ave., Ste. 225
 Kansas City, MO 64151

Plaintiff,

v.

JJ STOLL, INC.,
Registered Agent:
 Stoll, Jennifer Janae
 6116 N. Harden Ct.
 Kansas City, MO 64151

Defendant.

Case No.: _____

Division: _____

REQUEST FOR JURY TRIAL

PETITION FOR DAMAGES

COMES NOW, Plaintiff Athena Reynolds, by and through her attorney, and for her cause of action against Defendant JJ Stoll, Inc., alleges as follows:

Parties and Jurisdiction

1. This is an employment case based upon and arising under the Age Discrimination in Employment Act, 29 U.S.C. § 621 *et seq.* ("ADEA").
2. Plaintiff Athena Reynolds ("Plaintiff") is a citizen of the United States, domiciled in the state of Missouri.
3. Defendant JJ Stoll, Inc. ("Clay-Platte Montessori") is and was at all relevant times a for-profit corporation incorporated under the laws of Missouri with a principal place of business in Kansas City, Missouri.
4. At all relevant times, Clay-Platte Montessori conducting substantial and continuous business in the state of Missouri.

5. Defendant Clay-Platte Montessori maintains and operates a place of business at 5901 NW Waukomis Dr., Kansas City, MO 64151.
6. At all relevant times, Clay-Platte Montessori employed twenty (20) or more people in each of twenty (20) or more calendar weeks in the current or preceding calendar year.
7. Clay-Platte Montessori is an employer within the meaning of the ADEA.
8. This court has jurisdiction over the parties and subject matter of this action.
9. Venue is proper pursuant to MO. REV. STAT. § 508.010 because Plaintiff was first injured by the alleged wrongful acts in Platte County, Missouri.

Administrative Procedures

10. On May 23, 2019, Plaintiff timely filed with the the Equal Employment Opportunity Commission ("EEOC") a Charge of Discrimination against Defendant alleging age discrimination (attached as Exhibit 1 and incorporated herein by reference).
11. On October 9, 2019, the EEOC issued to Plaintiff a Notice of Right to Sue (attached as Exhibit 2 and incorporated herein by reference).
12. The aforesaid Charge of Discrimination provided the EEOC sufficient opportunity to investigate the full scope of the controversy between the parties and, accordingly, the sweep of this judicial complaint may be and is as broad as the scope of a EEOC investigation, which could reasonably be expected to have grown out of the Charge of Discrimination.
13. This lawsuit is filed within ninety (90) days of the issuance of the EEOC's Notice of Right to Sue.
14. Plaintiff has satisfied all private, administrative, and judicial prerequisites to the institution of this action.

15. This action is filed within the applicable statute of limitations.

Additional Factual Allegations

16. Plaintiff re-alleges and incorporates herein by reference, as though fully set forth herein, all of the above numbered paragraphs.
17. Plaintiff began working for the Clay-Platte Montessori School under prior ownership October 2008 as a teacher.
18. In 2017, one of the teachers, as the entity JJ Stoll, Inc., purchased Clay-Platte Montessori.
19. Over the course of the next approximately year-and-a-half, Clay-Platte Montessori systematically terminated the employment of nearly fifteen (15) teachers over the age of forty (40).
20. The reasons given for the termination of these employees were various but generally pretextual.
21. After terminating the older teachers, Clay-Platte Montessori replaced nearly all of them with substantially younger teachers.
22. On July 27, 2018, Clay-Platte Montessori terminated Plaintiff's employment.
23. Plaintiff was aged 42 at the time of the termination of her employment with Clay-Platte Montessori.
24. Upon information and belief, Clay Platte Montessori replaced Plaintiff with a substantially younger employee.

COUNT I

**Violation of 29 U.S.C. § 621 *et seq.*
Age Discrimination**

25. Plaintiff re-alleges and incorporates herein by reference, as though fully set forth herein, all of the above numbered paragraphs.

26. Plaintiff is over the age of forty (40) and therefore a member of a protected class pursuant to the ADEA.
27. Clay-Platte Montessori subjected Plaintiff to an adverse employment action because it terminated her employment.
28. Plaintiff's age was a determining factor in Clay-Platte Montessori's decision to terminate Plaintiff's employment.
29. At all times mentioned herein, before and after, the above described perpetrators were agents, servants, and employees of Clay-Platte Montessori and were at all such times acting within the scope and course of their agency and employment, and/or their actions were expressly authorized by Clay-Platte Montessori, thus making Clay-Platte Montessori liable for said actions under the doctrine of *respondent superior*.
30. Clay-Platte Montessori failed to make good faith efforts to establish and enforce policies to prevent illegal discrimination against its employees, including age discrimination.
31. Clay-Platte Montessori failed to properly train or otherwise inform their supervisors and employees concerning their duties and obligations under the civil rights laws, including the ADEA.
32. Plaintiff suffered intentional discrimination at the hands of Clay-Platte Montessori, based on her age, in violation of the ADEA.
33. As a direct and proximate result of Clay-Platte Montessori's actions and/or omissions, Plaintiff has been deprived of income, as well as other monetary and non-monetary benefits.

34. By failing to take prompt and effective remedial action and instead of re-employing Plaintiff, Clay-Platte Montessori, in effect, condoned, ratified, and/or authorized discrimination against Plaintiff.
35. As shown by the foregoing, Clay-Platte Montessori's conduct was willful, wanton, and malicious, and showed complete indifference to or conscious disregard for the rights of others, including the rights of Plaintiff, thus justifying an award of liquidated damages.
36. Pursuant to the provisions of the ADEA, Plaintiff is entitled to recover her reasonable attorney's fees from Clay-Platte Montessori.

WHEREFORE, Plaintiff requests that the Court enter judgment in her favor and against Clay-Platte Montessori for economic damages, including but not limited to back-pay and lost benefits; for equitable relief, including but not limited to front-pay and injunctive relief; for liquidated damages; for reasonable attorney's fees and costs incurred herein; for pre- and post-judgment interest as allowed by law; and for such other and further legal and equitable relief as the Court deems just and proper.

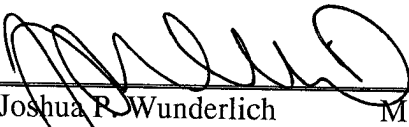
Demand for Jury Trial

Plaintiff requests a trial by jury, in the Circuit Court of Platte County, Missouri, on all counts and allegations of wrongful conduct alleged in this Petition.

(Signature on following page)

Respectfully Submitted,

CORNERSTONE LAW FIRM

By: 
Joshua P. Wunderlich MO BAR 64254
j.wunderlich@cornerstonefirm.com
8350 N. St. Clair Ave., Ste. 225
Kansas City, Missouri 64151
Telephone (816) 581-4040
Facsimile (816) 741-8889

ATTORNEY FOR PLAINTIFF

EEOC Form 6 (11/82)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: <input checked="" type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC Agency (ies) Charge No(s): 563-2019-02070	
Missouri Commission on Human Rights and EEOC			
Name (include Mr., Mrs., Miss) Ms. Athena Reynolds		Home Phone (incl. Area Code) 816-581-4040	
Street Address 8350 North Saint Clair Avenue		City, State and ZIP Code Kansas City, Missouri 64151	
Named Is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name JJ Stoll Inc.		No. Employees, Members 20+	
Street Address 5901 NW Waukomis Drive		City, State and ZIP Code Kansas City, Missouri 64151	
Name Jennifer Stoll		No. Employees, Members 20+	
Street Address 5901 NW Waukomis Drive		City, State and ZIP Code Kansas City, M 64151	
DISCRIMINATION BASED ON (check appropriate box(es)) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest: 2017 - Present Latest: <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheets): Please see attached.			
I send this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct. Date: 5/23/2019 Charging Party Signature: <i>Athena Reynolds</i>		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

RECEIVED EEOC
KANSAS CITY AREA OFFICE
2019 MAY 23 PM 2:5



May-23-2019 13:18 From: 8167418889

Page: 4/6

CHARGE OF DISCRIMINATION		Charge Presented To:	
This form is provided by the Missouri Human Rights Act. It is not to be used for any other purpose.		<input checked="" type="checkbox"/> FETV <input checked="" type="checkbox"/> EEOC	
Missouri Commission on Human Rights		and EEOC	
Name (Last, First, Middle Initial)	City, State and ZIP Code	Phone Number (Last Area Code)	Date of Filing
Ms. Athena Reynolds	8350 North Saint Clair Avenue Kansas City, Missouri 64151	816-581-4040	12/26/1975
Street Address	City, State and ZIP Code	No. Employees, Employer	Present for: (check all that apply)
5901 NW Waukomis Drive	Kansas City, Missouri 64151	20+	<input checked="" type="checkbox"/> DISCRIMINATION <input type="checkbox"/> HARASSMENT <input type="checkbox"/> RETALIATION <input type="checkbox"/> OTHER
Name	City, State and ZIP Code	No. Employees, Employer	Present for: (check all that apply)
Joshua Stoll	Kansas City, Missouri 64151	20+	<input checked="" type="checkbox"/> DISCRIMINATION <input type="checkbox"/> HARASSMENT <input type="checkbox"/> RETALIATION <input type="checkbox"/> OTHER
Street Address	City, State and ZIP Code	No. Employees, Employer	Present for: (check all that apply)
5901 NW Waukomis Drive	Kansas City, Missouri 64151	20+	<input checked="" type="checkbox"/> DISCRIMINATION <input type="checkbox"/> HARASSMENT <input type="checkbox"/> RETALIATION <input type="checkbox"/> OTHER
<p>DISCRIMINATION BASED ON (check appropriate category)</p> <p><input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN</p> <p><input type="checkbox"/> ANCESTRY <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> SEXUAL ORIENTATION</p> <p><input type="checkbox"/> OTHER (Specify):</p>			
<p>DATE OF DISCRIMINATION (month/year) 2017- Present</p> <p><input checked="" type="checkbox"/> CONTINUING ACTION</p>			
<p>PLEASE SEE ATTACHED.</p>			
<p>Signature of Complainant (Last, First, Middle Initial)</p> <p>5/23/2019 <i>Athena Reynolds</i></p> <p>City, State and ZIP Code</p>			
<p>Signature of Employer (Last, First, Middle Initial)</p> <p>5/23/2019 <i>Joshua Stoll</i></p> <p>City, State and ZIP Code</p>			
<p>WITNESS - When necessary for state and federal agency purposes</p> <p>NAME OF WITNESS (Last, First, Middle Initial)</p> <p>DATE OF FILING (month/year)</p>			
<p>DISCRIMINATION BASED ON (check appropriate category)</p> <p><input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN</p> <p><input type="checkbox"/> ANCESTRY <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> SEXUAL ORIENTATION</p> <p><input type="checkbox"/> OTHER (Specify):</p>			
<p>DATE OF DISCRIMINATION (month/year) 2017- Present</p> <p><input checked="" type="checkbox"/> CONTINUING ACTION</p>			
<p>PLEASE SEE ATTACHED.</p>			

Attachment to EEOC Form 5 (5/01) for Athena Reynolds

I, Athena Reynolds, bring this Charge of Discrimination against Respondents Jennifer Stoll and Joshua Stoll, d/b/a Clay-Platte Montessori School ("the school"), and JJ Stoll, Inc. (collectively "Clay-Platte Montessori"). Respondents were my joint and several employers within the meaning of the Age Discrimination in Employment Act, 29 U.S.C. §§ 621 *et seq.* ("ADEA").

I am a former employee of Clay-Platte Montessori and a member of a protected class pursuant to the ADEA because of my age, which at the time of my termination was forty-two (42). The specific facts that give rise to my claim of age discrimination are as follows:

I began working for the school, then under different ownership, in October 2008. In 2017, Respondent Jennifer Stoll, who had been a teacher for some time, purchased the school, either individually, in conjunction with Respondent Joshua Stoll, through JJ Stoll, Inc., or in some combination thereof. After that time, Clay-Platte Montessori began systematically terminating all of the school's employees that were over forty (40) years of age. Over the course of approximately one-and-a-half (1.5) years, approximately fifteen (15) employees over forty (40) years of age either were fired or felt as though they were forced to quit. As the older employees were forced out, Clay-Platte Montessori replaced each of them with a substantially younger employee. My employment was terminated on July 27, 2018.

In sum, I am a member of a protected class under the ADEA. Clay-Platte Montessori discriminated against me because of my age. As a result of Clay-Platte Montessori's actions, I am seeking back-pay, front-pay, emotional distress damages, attorneys' fees, punitive damages, and any other remedies the Commission deems appropriate.

EEOC Form 161 (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Athena Reynolds**
8350 North Saint Clair Ave
Suite 225
Kansas City, MO 64151

From: **Kansas City Area Office**
Gateway Tower II
400 State Avenue, Suite 905
Kansas City, KS 66101



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

563-2019-02070

Leah Sibert,
Investigator

(913) 551-5655

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- ☒ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☐ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Enclosures(s)

For:

Natascha Deguire,
Area Office Director

OCT 09 2019

(Date Mailed)

cc:

Jennifer Stoll
Owner
JJ STOLL INC
5901 NW Waukomis Drive
Kansas City, MO 64151

Joshua Wunderlich
CORNERSTONE LAW FIRM
8350 North St. Clair Ave
Suite 225
Kansas City, MO 64151

PLAINTIFF'S
EXHIBIT

2

IN THE CIRCUIT COURT OF PLATTE COUNTY, MISSOURI

ATHENA REYNOLDS,

Plaintiff,

v.

JJ STOLL, INC.,

Defendant.

Case No.: _____

Division: _____

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff, by and through its attorney of record, and for its Motion for Approval/Appoint of Private Process Server, and requests that D&B Legal Services, Inc.: Legal Names (s):

Jamie Andrews PPS20-0009
Caleb Battreal PPS20-0010
Bernard Beletsky PPS20-0011
Carrington Bell PPS20-0012
Thomas Bogue PPS20-0013
Brent Bohnhoff PPS20-0014
Arthur Boyer PPS20-0015
Scott Brady PPS20-0016
Gary Brakemeyer PPS20-0017
Jeff Brown PPS20-0018
Hester Bryant PPS20-0019
Nicholas Bull PPS20-0020
Randy Burrow PPS20-0021
Gory Burt PPS20-0022
Kyle Carter PPS20-0023
Michael Conklin PPS20-0024
Lisa Corbett PPS20-0025
Dennis Dahlberg PPS20-0026
Mary Dahlberg PPS20-0027
Bert Daniels JR PPS20-0028
Richard Davis PPS20-0029
David Dice PPS20-0030
Maureen Dice PPS20-0031
Norman Diggs PPS20-0032
Edwina Ditmore PPS20-0033
Marrissa Doan PPS20-0034
Shawn Edwards PPS20-0035
Tonya Elkins PPS20-0036
William Ferrell PPS20-0037
James Frago PPS20-0038

John Frago PPS20-0039
Kenneth Frechette II PPS20-0040
Andrew Garza PPS20-0041
Bradley Gordon PPS20-0042
Thomas Gorgen PPS20-0043
Tom Gorgone PPS20-0044
Richard Gray PPS20-0045
Charles Gunning PPS20-0046
James Hannah PPS20-0047
Rufus harmon PPS20-0048
James Harvey PPS20-0049
Natalie Hawks PPS20-0050
Douglas Hays PPS20-0051
Stephen Heitz PPS20-0052
Wendy Hilgenberg PPS20-0053
James Hise PPS20-0054
Gerald Hissam PPS20-0055
William Hockersmith PPS20-0056
Alex Holland PPS20-0057
Mary Hurley PPS20-0058
Betty Johnson PPS20-0059
Edward Johnson PPS20-0060
James Johnson PPS20-0061
Etoya Jones PPS20-0062
Patrick Jones PPS20-0063
Derec Kelley PPS20-0064
Brent Kirkhart PPS20-0065
Janice Kirkhart PPS20-0066
Tyler Kirkhart PPS20-0067
Damon Lester PPS20-0068

Daniel Maglothin PPS20-0069
Chad Maier PPS20-0070
Kenneth Marshall PPS20-0071
Deborah Martin PPS20-0072
Michael Martin PPS20-0073
Todd Martinson PPS20-0074
Timothy McGarity PPS20-0075
Casey McKee PPS20-0076
Michael Meador PPS20-0077
Kenny Medlin PPS20-0078
Maria Meier PPS20-0079
Thomas Melte PPS20-0080
Matthew Millhollin PPS20-0081
James Mitchell PPS20-0082
Alexious Moehring PPS20-0083
Jonathan Moehring PPS20-0084
Jason Moody PPS20-0085
Ronald Moore PPS20-0086
Andrew Myers PPS20-0087
Frederick Myers PPS20-0088
James Myers PPS20-0089
Stephanie Myers PPS20-0090
Christopher New PPS20-0091
Jeremy Nicholas PPS20-0092
Michael Noble PPS20-0093
Greg Noll PPS20-0094
Robert O'Sullivan PPS20-0095
Mike Perry PPS20-0096
Bob Peters PPS20-0097
Devin Pettenger PPS20-0098

Carrie Pfeifer PPS20-0099
 Craig Poese PPS20-0159
 Bill Powell PPS20-0100
 Dee Powell PPS20-0101
 Samantha Powell PPS20-0102
 Kim Presler PPS20-0103
 Marcus Presler PPS20-0104
 Mark Rauss PPS20-0105
 Terri Richards PPS20-0106
 Jorge Rivera PPS20-0107
 Sammie Robinson PPS20-0108
 Richard Roth PPS20-0109
 Edna Russell PPS20-0110
 Brenda Schiwitz PPS20-0111

Michael Siegel PPS20-214
 Joe Sherrod PPS20-0112
 Andrew Sitzes PPS20-0113
 Laura Skinner PPS20-0114
 Thomas Skinner PPS20-0115
 Richard Skyles PPS20-0215
 Chris Stanton PPS20-0216
 William Steck PPS20-0116
 Randy Stone PPS20-0117
 Sonja Stone PPS20-0118
 David Taliaferro PPS20-0119
 Michael Taylor PPS20-0120
 Robert Torrey PPS20-0121
 Lucas Traugott PPS20-0122

Steve Trueblood PPS20-0123
 Jonathan Trumpower PPS20-0124
 Ryan Weekley PPS20-0125
 Misty Wege PPS20-0126
 Andrew Wheeler PPS20-0127
 Andrew Wickliffe PPS20-0128
 Norman Wiley PPS20-0129
 Gregory Willing PPS20-0130
 Conni Wilson PPS20-0131
 Jerry Wilson PPS20-0132
 Debra Woodhouse PPS20-0133
 Stan Yoder PPS20-0134
 Greg Zotta PPS20-0135

who are qualified persons to serve process, are not parties to the case and are not less than eighteen (18) years of age, as private process servers in the above cause to serve process in this case.

Respectfully Submitted,

CORNERSTONE LAW FIRM

By:



Joshua P. Wunderlich MO BAR 64254
 j.wunderlich@cornerstonefirm.com
 8350 N. St. Clair Ave., Ste. 225
 Kansas City, Missouri 64151
 Telephone (816) 581-4040
 Facsimile (816) 741-8889

ATTORNEY FOR PLAINTIFF

ORDER

It is hereby ordered that the Plaintiff's Motion for Approval and Appointment of private process server is granted, and the above-named individuals are hereby approved and appointed to serve process in the above-captioned matter.

Date: _____

 Judge or Clerk

IN THE CIRCUIT COURT OF PLATTE COUNTY, MISSOURI

ATHENA REYNOLDS,

Plaintiff,

v.

JJ STOLL, INC.,

Defendant.

Case No.: _____

Division: _____

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Arthur Boyer PPS20-0015
Scott Brady PPS20-0016
Gary Brakemeyer PPS20-0017
Jeff Brown PPS20-0018
Hester Bryant PPS20-0019
Nicholas Bull PPS20-0020
Randy Burrow PPS20-0021
Gory Burt PPS20-0022
Kyle Carter PPS20-0023
Michael Conklin PPS20-0024
Lisa Corbett PPS20-0025
Dennis Dahlberg PPS20-0026
Mary Dahlberg PPS20-0027
Bert Daniels JR PPS20-0028
Richard Davis PPS20-0029
David Dice PPS20-0030
Maureen Dice PPS20-0031
Norman Diggs PPS20-0032
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Patrick Jones PPS20-0063
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Janice Kirkhart PPS20-0066
Tyler Kirkhart PPS20-0067
Damon Lester PPS20-0068

Daniel Maglothin PPS20-0069
Chad Maier PPS20-0070
Kenneth Marshall PPS20-0071
Deborah Martin PPS20-0072
Michael Martin PPS20-0073
Todd Martinson PPS20-0074
Timothy McGarity PPS20-0075
Casey McKee PPS20-0076
Michael Meador PPS20-0077
Kenny Medlin PPS20-0078
Maria Meier PPS20-0079
Thomas Melte PPS20-0080
Matthew Millhollin PPS20-0081
James Mitchell PPS20-0082
Alexious Moehring PPS20-0083
Jonathan Moehring PPS20-0084
Jason Moody PPS20-0085
Ronald Moore PPS20-0086
Andrew Myers PPS20-0087
Frederick Myers PPS20-0088
James Myers PPS20-0089
Stephanie Myers PPS20-0090
Christopher New PPS20-0091
Jeremy Nicholas PPS20-0092
Michael Noble PPS20-0093
Greg Noll PPS20-0094
Robert O'Sullivan PPS20-0095
Mike Perry PPS20-0096
Bob Peters PPS20-0097
Devin Pettenger PPS20-0098

Carrie Pfeifer PPS20-0099
Craig Poesse PPS20-0159
Bill Powell PPS20-0100
Dee Powell PPS20-0101
Samantha Powell PPS20-0102
Kim Presler PPS20-0103
Marcus Presler PPS20-0104
Mark Rauss PPS20-0105
Terri Richards PPS20-0106
Jorge Rivera PPS20-0107
Sammie Robinson PPS20-0108
Richard Roth PPS20-0109
Edna Russell PPS20-0110
Brenda Schiwitz PPS20-0111

Michael Siegel PPS20-214
Joe Sherrod PPS20-0112
Andrew Sitzes PPS20-0113
Laura Skinner PPS20-0114
Thomas Skinner PPS20-0115
Richard Skyles PPS20-0215
Chris Stanton PPS20-0216
William Steck PPS20-0116
Randy Stone PPS20-0117
Sonja Stone PPS20-0118
David Taliaferro PPS20-0119
Michael Taylor PPS20-0120
Robert Torrey PPS20-0121
Lucas Traugott PPS20-0122

Steve Trueblood PPS20-0123
Jonathan Trumpower PPS20-0124
Ryan Weekley PPS20-0125
Misty Wege PPS20-0126
Andrew Wheeler PPS20-0127
Andrew Wickliffe PPS20-0128
Norman Wiley PPS20-0129
Gregory Willing PPS20-0130
Conni Wilson PPS20-0131
Jerry Wilson PPS20-0132
Debra Woodhouse PPS20-0133
Stan Yoder PPS20-0134
Greg Zotta PPS20-0135

who are qualified persons to serve process, are not parties to the case and are not less than eighteen (18) years of age, as private process servers in the above cause to serve process in this case.

Respectfully Submitted,

CORNERSTONE LAW FIRM

By:



Joshua P. Wunderlich MO BAR 64254

j.wunderlich@cornerstonefirm.com

8350 N. St. Clair Ave., Ste. 225

Kansas City, Missouri 64151

Telephone (816) 581-4040

Facsimile (816) 741-8889

ATTORNEY FOR PLAINTIFF

ORDER

FILED
1/8/2020
08:57 am
KIMBERLY K. JOHNSON
CIRCUIT CLERK
PLATTE COUNTY, MO

It is hereby ordered that the Plaintiff's Motion for Approval and Appointment of private process server is granted, and the above-named individuals are hereby approved and appointed to serve process in the above-captioned matter.

Date: Wednesday, January 08, 2020



Wednesday, January 08, 2020

Judge or Clerk



IN THE CIRCUIT COURT OF PLATTE COUNTY, MISSOURI

NOTICE SETTING ON CALENDAR

STATE OF MISSOURI)
) ss
COUNTY OF PLATTE)

CASE NO: 20AE-CC00007
NATURE OF SUIT: CC Other Tort

ATHENA ANNE REYNOLDS
Plaintiff/Petitioner

V.

JJ STOLL, INC.
Defendant/Respondent

TO:

ATHENA ANNE REYNOLDS 4226 N. OLIVE ST. GLADSTONE, MO 64116	JJ STOLL, INC. REG. AGENT: STOLL, JENNIFER 6116 N. HARDEN CT. KANSAS CITY, MO 64151	JOSHUA PAUL WUNDERLICH 8350 N ST CLAIR AVE, SUITE 225 KANSAS CITY, MO 64151	
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You are hereby notified that the referenced case has been set on the calendar as follows:

Division:

DATE:

Time:

Setting:

DIVISION 2 COURT ROOM

10-APR-2020

09:00 AM

90 DAY DOCKET CALL

Date: 08-JAN-2020


Kimberly K. Johnson
Circuit Clerk, Platte County



IN THE 6TH JUDICIAL CIRCUIT, PLATTE COUNTY, MISSOURI

Judge or Division: JAMES W VAN AMBURG	Case Number: 20AE-CC00007	(Date File Stamp)
Plaintiff/Petitioner: ATHENA ANNE REYNOLDS	Plaintiff's/Petitioner's Attorney/Address JOSHUA PAUL WUNDERLICH 8350 N ST CLAIR AVE, SUITE 225 KANSAS CITY, MO 64151	
Defendant/Respondent: JJ STOLL, INC.	Court Address: 415 3RD STREET SUITE 5 PLATTE CITY, MO 64079	
Nature of Suit: CC Other Tort		

Summons in Civil Case

The State of Missouri to: JJ STOLL, INC. Alias: REG. AGENT: STOLL, JENNIFER 6116 N. HARDEN CT. KANSAS CITY, MO 64151 COURT SEAL OF  PLATTE COUNTY	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p><u>Wednesday, January 08, 2020</u> <u>/s/ Kimberly K. Johnson C.C. by Lindsey D. Burris D.C.</u> Date Clerk</p>
--	--

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____
Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ _____

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

AFFIDAVIT OF SERVICE

State of Missouri

County of Platte

Circuit Court

Case Number: 20AE-CC00007

Plaintiff:
ATHENA ANNE REYNOLDS

vs.

Defendant:
JJ STOLL INC

For:
CORNERSTONE LAW FIRM
8350 N ST CLAIR AVE
SUITE 225
KANSAS CITY, MO 64151



Received by D & B Legal Services, Inc. on the 21st day of January, 2020 at 9:27 am to be served on **JJ STOLL INC C/O REGISTERED AGENT JENNIFER STOLL, 6116 N HARDEN CT, KANSAS CITY, MO 64151.**

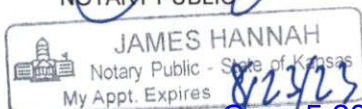
I, Maureen Dice PPS19-0825 / PPS20-0031, being duly sworn, depose and say that on the **26th day of January, 2020 at 9:35 am, I:**

served a **CORPORATION** by delivering a true copy of the **Summons in Civil Case, Petition For Damages, Plaintiff's Exhibit 1, Plaintiff's Exhibit 2** with the date and hour of service endorsed thereon by me, to: **JENNIFER STOLL as REGISTERED AGENT for JJ STOLL INC, at the address of: 6116 N HARDEN CT, KANSAS CITY, MO 64151.**

I certify that I am over the age of 18 and have no interest in the above action and the foregoing statements made by me are true and correct.

Subscribed and Sworn to before me on the 27th day of
January, 2020

NOTARY PUBLIC



Maureen Dice

Maureen Dice PPS19-0825 / PPS20-0031
Process Server

D & B Legal Services, Inc.
P.O. Box 7471
Overland Park, KS 66207
(913) 362-8110

Our Job Serial Number: POW-2020000566



IN THE 6TH JUDICIAL CIRCUIT, PLATTE COUNTY, MISSOURI

Judge or Division: JAMES W VAN AMBURG	Case Number: 20AE-CC00007
Plaintiff/Petitioner: ATHENA ANNE REYNOLDS	Plaintiff's/Petitioner's Attorney/Address JOSHUA PAUL WUNDERLICH 8350 N ST CLAIR AVE, SUITE 225 KANSAS CITY, MO 64151
Defendant/Respondent: JJ STOLL, INC.	Court Address: 415 3RD STREET SUITE 5 PLATTE CITY, MO 64079
Nature of Suit: CC Other Tort	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: **JJ STOLL, INC.**

Alias:

REG. AGENT: STOLL, JENNIFER
6116 N. HARDEN CT.
KANSAS CITY, MO 64151

COURT SEAL OF



PLATTE COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

Wednesday, January 08, 2020
Date

/s/ Kimberly K. Johnson C.C. by Lindsey D. Burris D.C.
Clerk

Further Information:

Sheriff's or Server's Return

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☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

☐ other: _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
Non Est \$ _____
Sheriff's Deputy Salary \$ 10.00
Supplemental Surcharge \$ _____
Mileage \$ _____ (_____ miles @ \$_____ per mile)
Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.